



**U.S. Department of Justice**

*United States Attorney  
Southern District of New York*

*86 Chambers Street, 3<sup>rd</sup> Floor  
New York, New York 10007*

May 25, 2022

By ECF

The Honorable Paul A. Engelmayer  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *D.J.C.V., et al. v. United States of America*, No. 20-cv-5747 (PAE)

Dear Judge Engelmayer:

This Office represents the United States of America (“Defendant”) in the above-captioned action. On March 21, 2022, the Court endorsed the parties’ proposed discovery plan whereby Defendant would: (1) submit responses and objections to Plaintiffs’ discovery demands by April 15, 2022; and (2) produce all documents responsive to Plaintiffs’ discovery requests by May 27, 2022. Additionally, pursuant to this plan, the parties proposed providing a status update to the Court on June 10, 2022. *See* Dkt. No. 116. Defendant writes to respectfully request a two-week extension of its May 27, 2022, deadline to produce responsive documents and a corresponding two-week extension of the date by which the parties must submit a status update to the Court. This is Defendant’s first request for an extension of this deadline, and Plaintiffs consent to this extension.

Since the Court entered its order on March 21, 2022, Defendant timely responded to Plaintiffs’ discovery requests on April 15, 2022. Thereafter, Defendant has produced more than ten thousand pages of documents unique to this litigation. Additionally, Defendant has produced more than 50,000 documents that were collected in earlier filed child separation litigations pending in the District of Arizona. These productions have come from several different agencies within the Government.

Defendant seeks this extension, however, because United States Immigration and Customs Enforcement (“ICE”) encountered technical issues in collecting and producing its tranche of documents.<sup>1</sup> As a result of this technical issue, ICE requires two additional weeks to complete its production. If required by the Court, ICE would be able to submit a declaration describing the status of its production and the issues it encountered that necessitated this extension.

Accordingly, Defendant respectfully requests that its deadline to complete document production be extended to June 10, 2022, and that the parties provide a status update to the Court by June 24, 2022. We thank the Court for its attention to this matter.

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<sup>1</sup> All other agencies will complete their productions by May 27, 2022.

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Respectfully,

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